

# **EXHIBIT E**

Jean Williams  
August 04, 2017

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1 -- excuse me -- Public Works?

2 A. Yes.

3 MS. SHEEHAN: Can we have that  
4 marked as Exhibit Number 1?

5 (Exhibit 1, marked)

6 Q. (By Ms. Sheehan) I'm going to hand you  
7 what's been marked as Exhibit Number 1 and ask you, is  
8 that a fair and accurate description of your duties as  
9 a Senior Clerk and Typist at the Department of Public  
10 Works from 1991 up until -- is that your present  
11 position at the department?

12 MR. MONTAGNA: Objection to form.

13 MS. SHEEHAN: Let me ask that -- I'm  
14 going to withdraw that question.

15 Q. (By Ms. Sheehan) What's your present  
16 position for the City of Springfield?

17 A. Senior Clerk Typist.

18 Q. I've handed you a document that's been  
19 marked as Exhibit Number 1. Is that a fair and  
20 accurate representation of your duties and  
21 responsibilities as a Senior Clerk Typist since 1991  
22 through the present time at the Department of Public  
23 Works?

24 A. Repeat that question again.

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1 Q. What was your role doing that?

2 A. Well, we were the -- I guess you could  
3 say we were the boss out on the road as far as  
4 telling --

5 Q. No. No. Before 2012.

6 A. Oh, no.

7 Q. Not when you went and did it.

8 A. No.

9 Q. So, you applied for the position, is that  
10 correct?

11 A. Yes.

12 Q. And did you go to any kind of meeting  
13 about the position?

14 A. Yes.

15 Q. Who was at the meeting?

16 A. A bunch of guys.

17 Q. Was there any other women at the meeting?

18 A. No, not at that meeting.

19 Q. Who ran the meeting?

20 A. I don't remember. I think John Rooney.  
21 Could have been somebody else with him. I don't  
22 remember.

23 Q. Where did you notice the posting for the  
24 position?

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1 record?

2 (A recess was taken)

3 MS. SHEEHAN: Back on the record.

4 Q. (By Ms. Sheehan) You went out with  
5 George how many times?

6 A. I don't remember.

7 Q. Did you go out with George this eleven  
8 p.m. to one p.m.?

9 A. Yes.

10 Q. How much were you paid per hour?

11 A. I think it's what it says on this paper,  
12 \$25 an hour.

13 Q. Did everybody get the same amount of pay?

14 A. I don't know.

15 Q. When you say you went out with George,  
16 what did you do? Did you sit in some sort of truck  
17 with him?

18 A. Yes.

19 Q. What kind of truck was it? Did it have a  
20 plow on it or not a plow or --

21 A. Yes.

22 Q. Yes, it did?

23 A. Yes, it did. It was, you know, one of  
24 those with the back end out. I forgot what you call

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1 A. If they applied, I don't know.

2 Q. I'm not asking if they applied. I'm  
3 asking -- because we've been over that.

4 A. Okay.

5 Q. I'm asking, do you know any other woman  
6 who told you or you heard wanted to be on the '12 to  
7 '13 Snow Inspector list --

8 A. Just those three.

9 Q. -- and did not get in? Okay. That's it.  
10 All right.

11 MR. MONTAGNA: Let her ask the  
12 question.

13 Q. (By Ms. Sheehan) Other than going out  
14 with George Larue on one occasion on the '12 to '13  
15 snow season, did you go out at all any other time?

16 A. In that season?

17 Q. Yes.

18 A. Yes, but I don't remember how many times.  
19 Maybe three or four other times.

20 Q. Were those -- who did you go with?

21 A. George.

22 Q. Each time?

23 A. Yes.

24 Q. And each time, were you a passenger and

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1 George would be driving the truck?

2 A. I drove once.

3 Q. How long were each one of these three or  
4 four additional sessions that you had in the 2012  
5 through 2013 snow season?

6 A. It was contingent on the weather. So, I  
7 don't know. I didn't keep track of the weather.

8 Q. No. I know. But you said the first one  
9 was eleven p.m. to one p.m. How long was the number  
10 two?

11 A. I don't remember.

12 Q. How about three?

13 A. They weren't as long as that one. That's  
14 why I remember that one, because that was like a long  
15 time.

16 Q. Do you remember how long any of the other  
17 times were that you went out as a Snow Route Inspector  
18 in the 2012 to 2013 snow season?

19 A. No.

20 Q. You drove one time?

21 A. I believe so, yes.

22 Q. Did you drive the whole time?

23 A. No.

24 Q. What other information did you learn from